

ROCKY FLATS ENVIRONMENTAL TECHNOLOGY SITE REGULATORY CONTACT RECORD

Date/Time February 11, 2004 / 14 45

Site Contact(s) J R Marschall
Phone 303-966-2372

Regulatory Contact Dave Kruchek
Phone 303-692-3328

Agency CDPHE

Purpose of Contact Leaving Non-Friable Tiles in Place in Building 991

Discussion

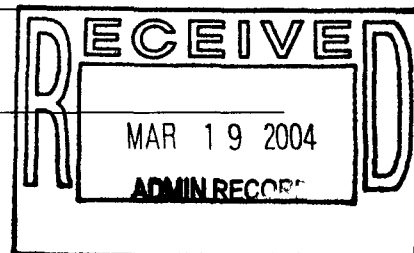
Kaiser-Hill proposed a deviation from the RSOP requirement to remove all ACM from Building 991, and leave the vinyl floor tiles in place during the demolition of the building. None of the tile is friable asbestos, however, some of the tiles contain amounts of asbestos ranging from 7 to 12% Chrysotile, but the majority of the tile being left is non-ACM. Additionally, the tiles left in place will be a minimum of 3' to 4' below the final proposed grade for the area, and since the site will be a wild life refuge there will be no buildings, homes, or other structures that could possibly disturb the tiles.

During the demolition, in addition to normal dust suppression, only rubber-tired equipment will be allowed on the tile to avoid potential pulverization that crawler or track type vehicles would create. Tiles may be broken during load out, but they will not be pulverized. Rubber-tired loaders will be utilized to remove the rubble from the floor area to the haul trucks and to move dirt into the basement tunnel that will be back-filled to grade level. Rubber-tired loaders will also spread a layer, 6" to 12", of dirt over the floor such that tracked vehicles can access the floor area without pulverizing the tiles and continue demolition of the superstructure. The waste from the building will be sent to a sanitary landfill as potentially containing asbestos. None of the concrete that could contain asbestos will be used as recycled fill on site. Finally, the 991 Close-Out Report will include specific locations of asbestos containing tile left in place.

Based on the tile and mastic being uncontaminated, the asbestos being non-friable in the tile and mastic, the limited amount of asbestos containing tile and mastic to remain, and utilizing appropriate demolition and debris removal techniques to prevent this asbestos from becoming friable/airborne, for this specific situation at Building 991, Dave Kruchek agreed that non-friable asbestos containing tile may be left in place.

Contact Record Prepared By J R Marschall

Contact Record 4/10/00
Rev 9/23/03



Required Distribution

M Aguilar, USEPA
S Bell, DOE-RFFO
B Birk, DOE-RFFO
C Deck, K-H Legal
D Foss, K-H 707/776/777
C Gilbreath, K-H 771/774
S Gunderson, CDPHE
L Kilpatrick, DOE-RFFO
G Kleeman, USEPA

J Legare, DOE-RFFO
R Leitner, K-H 371/374
D Maxwell, DOE-RFFO
J Mead, K-H ESS
S Nesta, K-H RISS
K North, K-H ESS/MS
R Schassburger, DOE-RFFO
D Shelton, K-H ESS
C Zahm, K-H Legal

Additional Distribution

David Kruchek, CDPHE
Gary Morgan, DOE-RFFO
Karen Wiemelt, K-H RISS